

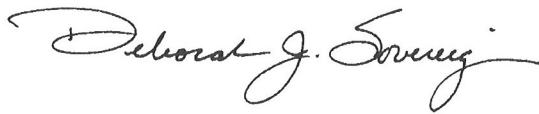
March 23, 2011

Federal Communications Commission
Office of the Secretary
445 12th Street SW
Washington, DC 20554

Dear Federal Communications Commission:

Please find the enclosed Petition for Waiver of the USAC guidelines for invoice deadline extension requests filed on behalf of Atoka Independent School District, Atoka, Oklahoma.

Respectfully submitted,



Deborah Sovereign, Consultant

Enclosures

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Request for Waiver by)	CC Docket No. 02-6
Atoka Indep School District 15)	
Invoice Deadline Extension Request)	
Form 471 Application # 392031)	
Funding Request Numbers: 1187799,)	
1187803, 1187806, 1187810, and)	
1187816)	

PETITION FOR WAIVER

ATOKA INDEP SCHOOL DISTRICT 15

March 23, 2011

Deborah Sovereign
Jane Kellogg

Kellogg & Sovereign Consulting, LLC
1101 Stadium Drive
Ada, OK 74820
(580) 332-1444
(580) 332-2532 (facsimile)
Email: dsovereign@kelloggllc.com

Atoka Independent School District, Atoka, Oklahoma hereby petitions the Commission to waive the Schools & Libraries' Division (SLD) of the Universal Service Administrative Company's (USAC) guidelines that consider an invoice extension is not filed in a timely manner if the extension is requested more than 120 days after the end of the service delivery date. We are requesting the waiver of the invoice extension request deadline for the following:

ATOKA INDEP SCHOOL DISTRICT 15: BEN 140233

Form 471 Application #	392031	392031	392031	392031	392031
Funding Request Number	1187799	1187803	1187806	1187810	1187816
Service Provider Name	Scholastic Comm.	Scholastic Comm.	Scholastic Comm.	Scholastic Comm.	OK Comm. (OK Voice & Data)
SPIN	143027725	143027725	143027725	143027725	143028361
Committed Amount	18,434.10	28,809.14	12,900.00	3,010.00	70,287.82

The applicant chose not to submit this appeal to USAC since they are past USAC's 120 day period for filing an invoice extension request.

When the applicant received their funding for 2004-05, their E-rate consulting firm, Kellogg & Sovereign Consulting, LLC (KSLLC) notified the district of their funding for all providers and worked with the applicant to file the Form 486. The Superintendent's assistant, Donna Hardman, was assigned the task of handling E-rate information for the district and Ms. Hardman worked with KSLLC to ensure all documentation was properly handled.

During the 2004-05 year, the district requested that the SPI (Service Provider Invoice) method be used for their funding requests. An email document dated 5/19/2005 in KSLLC's files related to a service provider change ("SPIN Change") for FRN

1187816 shows that in documentation sent to Ms. Hardman, KSLLC wrote, "You can now proceed with the project and OK Voice & Data may submit invoices to SLD when the project is completed." In an email dated 4/22/2005, KSLLC notified the service provider, OK Communications (dba OK Voice & Data) that they needed to file a Form 473 and in the same email stated "The form must be received by SLD before they will pay your invoice on the project."

However, there was an apparent miscommunication between Ms. Hardman and the accounts payable department regarding E-rate invoices that should have E-rate discounts applied by the service provider. Invoices were paid by the accounts payable clerk, Linda Escue, who paid the invoices in full according to normal school procedures.

In late 2006, Teddy Gabbart with Scholastic Communications, who also had not been successful getting the district to resolve this issue, contacted KSLLC to find out the status on the reimbursements for 2004-05. KSLLC researched the matter and contacted Ms. Hardman to let them know that if they could gather the necessary documentation, KSLLC could file an invoice extension request. At the same time, the applicant was having staffing changes and Ms. Hardman left the school without a replacement in October, 2006.

In July, 2010, Mr. Dwayne Noble was hired as Superintendent of the district. Mr. Gabbart notified Mr. Noble of the 2004-05 issue and asked if he would be interested in locating the necessary documentation including invoices and cleared checks that would be needed to file for an invoice extension. Mr. Noble worked with his assistant, Tricia Thomas, to see if they could locate the documentation and in January, 2011, the district was able to locate the invoices including copies of the associated cleared checks.

The applicant has asked KSLLC to see if there is any way possible we could request an invoice extension for FY 2004-05 so they could properly file for reimbursements that are due to them for the E-rate products and services they purchased with the expectation of receiving E-rate discounts. They are sincerely distressed over the situation and are experiencing budget problems as a result of the prior year deficit.

We understand that the 120 day guideline used by SLD/USAC in determining whether or not to approve invoicing deadline extension requests is necessary to expedite processing. However, in this particular situation, the staff changes resulted in circumstances beyond the control of the service provider and an undue hardship on the school district. Mr. Noble took action as soon as he had proper staffing in place to handle this matter. Additionally, the district has copies of the bills and cleared checks related to the funding to document the charges incurred related to the above listed funding requests.

Therefore, we are respectfully requesting a waiver of the SLD guidelines regarding invoice extension requests and respectfully request that an invoice extension be granted for FRNs 1187799, 1187803, 1187806, 1187810, and 1187816.

Respectfully Submitted,

A handwritten signature in black ink, reading "Deborah J. Sovereign". The signature is fluid and cursive, with a large initial 'D' and 'S'.

Deborah J. Sovereign, Consultant

Attachments:

- A. Sample of Invoices & cleared checks on file
- B. Emails dated 5/19/2005 and 4/22/2005 requesting that the provider invoice USAC/SLD
- C. Funding Commitment Decision Letter
- D. Letter of Agency

ATTACHMENT D:

Letter of Agency

Scholastic Communications

2912 Enterprise Blvd. Suite C2
Durant, OK 74701

1187803

Invoice

Date	Invoice #
7/21/2004	2004072101

Bill To
Atoka Public Schools - E-Rate Dwayne Noble 200 S. Oregon Atoka, Oklahoma 74525

Ship To
Atoka Public Schools - E-Rate Mark McPherson Atoka, Oklahoma 74525

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
	Net 15	TG	7/21/2004			
Quantity	Item Code	Description			Price Each	Amount
1	E-Rate Maintenanc...	Maintenance and Technical Support per E-Rate Service Agreement: Server Maintenance July 2004			2,850.00	2,850.00
		Scholastic Communications SPIN 143027725				
		Funding Request Number: 1187803				
		Sales Tax			0.00%	0.00
Thank you for your business.					Total	\$2,850.00

ATTACHMENT #

A1

1187799

Scholastic Communications

Invoice

2912 Enterprise Blvd. Suite C2
Durant, OK 74701

Date	Invoice #
7/21/2004	2004072102

Bill To
Atoka Public Schools - E-Rate Dwayne Noble 200 S. Oregon Atoka, Oklahoma 74525

Ship To
Atoka Public Schools - E-Rate Mark McPherson Atoka, Oklahoma 74525

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
	Net 15	TG	7/21/2004			
Quantity	Item Code	Description			Price Each	Amount
23	Network Cable Drop	New Network Cable Drop including all labor, cable, punch downs, and patch cable for CAT5E Network from Switch to Room. Middle School Library = 20 Drops High School Ag Dept = 3 Drops Scholastic Communications SPIN 143027725 Funding Request Number: 1187799 Sales Tax			90.00	2,070.00T
					0.00%	0.00
Thank you for your business.					Total	\$2,070.00

ATTACHMENT #

A-2

C.H. Cole

AMERISTATE BANK ATOKA, OKLAHOMA		
DATE	NUMBER	AMOUNT
08/02/04	2933	\$14,300.00

003-2004

PAY TO THE ORDER OF

PRESIDENT *Bud Copeland*

CLERK *Linda Hie*

TREASURER *Ron Joralle*

ATOKA, OKLAHOMA

OK 74592

103102452

Date 8/2/2004, Amount \$14,300.00

ATOKA COUNTY ATOKA, OKLAHOMA		
DATE	NUMBER	AMOUNT
08/02/04	58	\$1,410.60

Series 2004-2005

PAY TO THE ORDER OF

PRESIDENT *Bud Copeland*

CLERK *Linda Hie*

TREASURER *Ron Joralle*

ATOKA, OKLAHOMA

OK 74525

103102452

Date 8/2/2004, Amount \$1,410.60

WARRANT/CHECK PAYABLE THROUGH AMERISTATE BANK ATOKA, OKLAHOMA		
DATE	NUMBER	AMOUNT
05/25/04	2456	\$70.14

1003-2004

PAY TO THE ORDER OF

PRESIDENT *Bud Copeland*

CLERK *Linda Hie*

TREASURER *Ron Joralle*

ATOKA, OKLAHOMA

OK 74592

10000007014

Date 8/2/2004, Amount \$70.14

THE BOARD OF EDUCATION ATOKA PUBLIC SCHOOL 115 Atoka County Atoka, Oklahoma		
DATE	NUMBER	AMOUNT
05/27/04	2702	\$2,127.79

Series 2003-2004

PAY TO THE ORDER OF

PRESIDENT *Bud Copeland*

CLERK *Linda Hie*

TREASURER *Ron Joralle*

ATOKA, OKLAHOMA

OK 74569

103102452

Date 8/2/2004, Amount \$2,127.79

WARRANT/CHECK PAYABLE THROUGH ATOKA STATE BANK ATOKA, OKLAHOMA		
DATE	NUMBER	AMOUNT
08/02/04	2932	\$13,000.00

1003-2004

PAY TO THE ORDER OF

PRESIDENT *Bud Copeland*

CLERK *Linda Hie*

TREASURER *Ron Joralle*

ATOKA, OKLAHOMA

OK 74592

0001300000

Date 8/2/2004, Amount \$13,000.00

THE BOARD OF EDUCATION ATOKA PUBLIC SCHOOL 115 Atoka County Atoka, Oklahoma		
DATE	NUMBER	AMOUNT
08/02/04	85	\$4,920.00

Series 2004-2005

PAY TO THE ORDER OF

PRESIDENT *Bud Copeland*

CLERK *Linda Hie*

TREASURER *Ron Joralle*

ATOKA, OKLAHOMA

OK 74701

103102452

Date 8/4/2004, Amount \$4,920.00

WARRANT/CHECK PAYABLE THROUGH ATOKA STATE BANK ATOKA, OKLAHOMA		
DATE	NUMBER	AMOUNT
08/02/04	72	\$26.70

1004-2005

PAY TO THE ORDER OF

PRESIDENT *Bud Copeland*

CLERK *Linda Hie*

TREASURER *Ron Joralle*

ATOKA, OKLAHOMA

OK 74592

0000024583

Date 8/4/2004, Amount \$26.70

THE BOARD OF EDUCATION ATOKA PUBLIC SCHOOL 115 Atoka County Atoka, Oklahoma		
DATE	NUMBER	AMOUNT
08/02/04	79	\$1,307.81

Series 2004-2005

PAY TO THE ORDER OF

PRESIDENT *Bud Copeland*

CLERK *Linda Hie*

TREASURER *Ron Joralle*

ATOKA, OKLAHOMA

OK 74525

103102452

Date 8/4/2004, Amount \$1,307.81

WARRANT/CHECK PAYABLE THROUGH ATOKA STATE BANK ATOKA, OKLAHOMA		
DATE	NUMBER	AMOUNT
08/02/04	73	\$268.83

2004-2005

PAY TO THE ORDER OF

PRESIDENT *Bud Copeland*

CLERK *Linda Hie*

TREASURER *Ron Joralle*

ATOKA, OKLAHOMA

OK 74592

0000024583

THE BOARD OF EDUCATION ATOKA PUBLIC SCHOOL 115 Atoka County Atoka, Oklahoma		
DATE	NUMBER	AMOUNT
08/02/04	88	\$1,100.00

Series 2004-2005

PAY TO THE ORDER OF

PRESIDENT *Bud Copeland*

CLERK *Linda Hie*

TREASURER *Ron Joralle*

ATOKA, OKLAHOMA

OK 74525

103102452

ATTACHMENT # A-3


ATTACHMENT B:

**Emails dated 4/22/05 and 5/19/05 requesting
the service provider invoice USAC/SLD**

To: okvoice@sbcglobal.net
From: Debi Sovereign <dsovereign@kelloggllc.com>
Subject: Atoka ISD-Erate project. SLD Form REQUIREMENT
Cc: dhardman@atoka.org
Bcc:
Attached:

Dan,

I am the E-Rate consultant for Atoka ISD. I have just submitted the request to change service providers on the project for Atoka's PBX system from SBC DataComm to OK Communications.

However, the SPIN for OK Communications, 143028361 is NOT currently active. You need to file a Form 473, Service Provider Annual Certification Form (SPAC) for FY 2004. The form must be received by SLD before they will pay your invoice on the project. 

You can download the Form 473 and instructions from the SLD web site:

<http://www.sl.universalservice.org/form/default.asp#vendors>

Be sure to complete and file the form for FY 2004 as soon as possible.
If you have any questions on how to complete the form, contact SLD's help desk at 888-203-8100.

Thank you,

Debi Sovereign

Kellogg & Sovereign Consulting, LLC
P.O. Box 130, 26576 Hwy 1E
Allen, OK 74825
Phone: 580.332.1444
Fax: 580.332.2532

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ATTACHMENT # B-1

To: dhardman@atoka.org
From: Debi Sovereign <dsovereign@kelloggllc.com>
Subject: SPIN change Approved-OK Voice & Data
Cc: okvoice@sbcglobal.net
Bcc:
Attached: S:\ERATE\Y7Erate0405\Atoka\ATOK_SPIN Chg 1187816 Appvl.pdf;

Donna,

SLD has approved the SPIN change request we filed on your behalf for FRN 1187816, PBX System. The new service provider is OK Communications (OK Voice & Data), SPIN 143028361.

You can now proceed with the project and OK Voice & Data may submit invoices to SLD when the project is completed. ←

-Debi Sovereign

Kellogg & Sovereign Consulting, LLC
P.O. Box 130, 10501 CR 3665
Allen, OK 74825
Phone: 580.332.1444
Fax: 580.332.2532

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ATTACHMENT # B.2

ATTACHMENT C:

Funding Commitment Decision Letter



Universal Service Administrative Company
Schools & Libraries Division

FUNDING COMMITMENT DECISION LETTER

(Funding Year 2004: 07/01/2004 - 06/30/2005)

January 11, 2005

Debi Sovereign or Jane Kellogg
ATOKA INDEP SCHOOL DISTRICT 15
902 Arlington Cntr, #136
Ada, OK 74820-2883

Re: Form 471 Application Number: 392031
Funding Year 2004: 07/01/2004 - 06/30/2005
Billed Entity Number: 140233
Applicant's Form Identifier: ATOKY7-2

Thank you for your Funding Year 2004 E-rate application and for any assistance you provided throughout our review. Here is the current status of the funding request(s) featured in the Funding Commitment Report at the end of this letter.

- The amount, \$135,999.56 is "Approved."

Please refer to the Funding Commitment Report on the page following this letter for specific funding request decisions and explanations.

The Important Reminders and Deadlines immediately preceding this letter are provided to assist you throughout the application process.

NEXT STEPS

- Review technology planning approval requirements
- Review CIPA Requirements
- File Form 486
- Invoice the SLD using the Form 474 (service providers) or Form 472 (Billed Entity)

FUNDING COMMITMENT REPORT

On the pages following this letter, we have provided a Funding Commitment Report for the Form 471 application cited above. The enclosed report includes a list of the Funding Request Number(s) (FRNs) from your application. The SLD is also sending this information to your service provider(s) so preparations can be made to begin implementing your E-rate discount(s) after you file your Form 486. Immediately preceding the Funding Commitment Report, you will find a guide that provides a definition for each line of the Report.

TO APPEAL THIS DECISION:

If you wish to appeal the decision indicated in this letter, your appeal must be received by the SLD or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and e-mail address (if available) for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Identify which Funding Commitment Decision(s) you are appealing. Indicate the relevant funding year and the date of the FCDL. Your letter of appeal must also include the Billed Entity Name, the

FUNDING COMMITMENT REPORT

Form 471 Application Number: 392031
Funding Request Number: 1187799 Funding Status: Funded
Services Ordered: Internal Connections
SPIN: 143027725 Service Provider Name: Scholastic Communications
Contract Number: NTWKELEC
Billing Account Number: N/A
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$21,435.00
Pre-discount Amount: \$21,435.00
Discount Percentage Approved by the SLD: 86%
Funding Commitment Decision: \$18,434.10 - FRN approved as submitted

Funding Request Number: 1187803 Funding Status: Funded
Services Ordered: Internal Connections
SPIN: 143027725 Service Provider Name: Scholastic Communications
Contract Number: SRVR&SETWR
Billing Account Number: N/A
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$33,499.00
Pre-discount Amount: \$33,499.00
Discount Percentage Approved by the SLD: 86%
Funding Commitment Decision: \$28,809.14 - FRN approved as submitted

Funding Request Number: 1187806 Funding Status: Funded
Services Ordered: Internal Connections
SPIN: 143027725 Service Provider Name: Scholastic Communications
Contract Number: NTWKMTTC
Billing Account Number: N/A
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$15,000.00
Pre-discount Amount: \$15,000.00
Discount Percentage Approved by the SLD: 86%
Funding Commitment Decision: \$12,900.00 - FRN approved as submitted

Funding Request Number: 1187810 Funding Status: Funded
Services Ordered: Internal Connections
SPIN: 143027725 Service Provider Name: Scholastic Communications
Contract Number: FRWL
Billing Account Number: N/A
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$3,500.00
Pre-discount Amount: \$3,500.00
Discount Percentage Approved by the SLD: 86%
Funding Commitment Decision: \$3,010.00 - FRN approved as submitted

FUNDING COMMITMENT REPORT

Form 471 Application Number: 392031
Funding Request Number: 1187811 Funding Status: Funded
Services Ordered: Internal Connections
SPIN: 143027725 Service Provider Name: Scholastic Communications
Contract Number: RTR
Billing Account Number: N/A
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$2,975.00
Pre-discount Amount: \$2,975.00
Discount Percentage Approved by the SLD: 86%
Funding Commitment Decision: \$2,558.50 - FRN approved as submitted

Funding Request Number: 1187816 Funding Status: Funded
Services Ordered: Internal Connections
SPIN: 143004812 Service Provider Name: SBC Datacomm, Inc.
Contract Number: PBX
Billing Account Number: N/A
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$81,730.02
Pre-discount Amount: \$81,730.02
Discount Percentage Approved by the SLD: 86%
Funding Commitment Decision: \$70,287.82 - FRN approved as submitted

E-Rate Summary by Applicant, FY 2004

Applicant Name: ATOKA INDEP SCHOOL DISTRICT 15
Billed Entity #: 140233

471 App #	FRN Service Provider	SPIN	Description Category	Form 486 SSD	Billing Acct/ Contract #	FCDL Date Fund Status	Pre-Disct Amount	Disct	Requested Amount	Committed Amount	Inv Mode SLD Paid	Amount Remaining
392030	1096055 Southwestern Bell Telephone	143004662	Telephone	07/01/2004		05/11/2004 funded	6,769.32	86%	5,821.62	5,821.62	spi	337.57
	1096062 Southwestern Bell Telephone	143004662	Long Distance	07/01/2004		05/11/2004 funded	876.00	86%	753.36	753.36	spi	488.29
	1096065 AT&T Corp.	143001192	Long Distance	07/01/2004		05/11/2004 funded	4,138.68	86%	3,559.26	3,559.26	bear	858.22
	1096069 Cingular Wireless Inc.	143025240	Cellular Svcs	07/01/2004		05/11/2004 funded	1,923.00	86%	1,653.78	1,653.78	spi	0.00
	1137090 Staff One dba TotalNet	143022598	Internet Access	07/01/2004		05/11/2004 funded	14,400.00	86%	12,384.00	12,384.00	bear	0.00
	1137109 Southwestern Bell Telephone	143004662	Telephone	07/01/2004		05/11/2004 funded	4,668.65	86%	4,015.04	4,015.04	not set	4,015.04
	1163427 Staff One dba TotalNet	143022598	Circuit-Other	07/01/2004		05/11/2004 funded	3,600.00	86%	3,096.00	3,096.00	bear	0.00
Totals for 471 App # 392030:							36,375.65		31,283.06	31,283.06	25,583.94	5,699.12
392031	1187799 Scholastic Communications	143027725	Network Electronics	07/01/2004		01/11/2005 funded	21,435.00	86%	18,434.10	18,434.10	not set	18,434.10
	1187803 Scholastic Communications	143027725	Server Software	07/01/2004		01/11/2005 funded	33,499.00	86%	28,809.14	28,809.14	not set	28,809.14
	1187806 Scholastic Communications	143027725	Network Mtc	07/01/2004		01/11/2005 funded	15,000.00	86%	12,900.00	12,900.00	not set	12,900.00
	1187810 Scholastic Communications	143027725	Firewall	07/01/2004		01/11/2005 funded	3,500.00	86%	3,010.00	3,010.00	not set	3,010.00
	1187811 Scholastic Communications	143027725	Router	/ /		01/11/2005 not funded	2,975.00	86%	2,568.50	0.00	not set	0.00
	1187816 OK Communications	143028361	PBX	04/22/2005		01/11/2005 funded	81,730.02	86%	70,287.82	70,287.82	not set	70,287.82
Totals for 471 App # 392031:							158,139.02		135,999.56	133,441.06	0.00	133,441.06

ATTACHMENT #

C4

E-Rate Summary by Applicant, FY 2004

Applicant Name:ATOKA INDEP SCHOOL DISTRICT 15
Billed Entity #: 140233

471 App #	FRN Service Provider	SPIN	Description Category	Form 486 SSD	Billing Acct/ Contract #	FCDL Date Fund Status	Pre-Disc't Amount	Disct	Requested Amount	Committed Amount	Inv Mode SLD Paid	Amount Remaining
Totals for Billed Entity # 140233:												
							194,514.67		167,282.62	164,724.12	25,583.94	139,140.18
Totals for all Billed Entity #'s:							194,514.67		167,282.62	164,724.12	25,583.94	139,140.18

ATTACHMENT # CS

ATTACHMENT D:

Letter of Agency

KELLOGG & SOVEREIGN CONSULTING, LLC**LETTER OF AGENCY****E-rate Program Years 2002, 2003, and 2004**

I authorize Jane Kellogg, Don Kellogg, Debi Sovereign, and/or Tacy Olivo, representatives of Kellogg & Sovereign Consulting, LLC (formerly Kellogg Consulting, LLC), to submit the E-rate Forms 470, 471, 486, 500, 472 (BEAR form), and other forms requested by the Schools and Libraries Division of the USAC on behalf of our school system. We also authorize the aforementioned representatives to act as our agents in soliciting, receiving, and preparing comparisons of proposals from service providers.

Name of School: ATOKA INDEP SCHOOL DISTRICT 15

As such, they are authorized to conduct the following on our behalf to:

- Prepare and submit all paperwork requested by the Schools and Libraries Division of the USAC (SLD)
- Act as our agent in working with representatives of SLD to resolve any questions or problems with applications
- Prepare Requests for Proposal (RFPs) to be posted to the Kellogg & Sovereign Consulting, LLC website and distributed to appropriate vendors
- Provide information to vendors as needed to clarify information in RFPs
- Receive bids for requested services from vendors
- Notify vendors of their selection to provide services once the authorized school contact has analyzed comparisons of bids submitted to us through Kellogg & Sovereign Consulting, LLC and we have notified Kellogg & Sovereign Consulting, LLC of our selections.
- Complete contracts as specifically directed by the authorized school contact person for eligible E-rate services

I also understand that in submitting these forms on our behalf, representatives of Kellogg & Sovereign Consulting are making certifications for our school system. By signing this letter of agency, I make the following certifications as required by the Schools and Libraries Division:

1. I recognize that support under this program is conditional upon the school(s) I represent (a) securing access to all of the resources, including computers, training, software, maintenance, and electrical connections necessary to use the services purchased effectively, and (b) securing funds to pay the school(s)' discounted charges for eligible services.
2. I certify that our school has an approved Technology Plan on file with the Oklahoma State Department of Education.
3. I certify that the school(s) eligible for support that I am representing have complied with all applicable state and local laws regarding procurement of services for which support is being sought.
4. I certify that the school's purchases at discounts provided by 47 U.S.C. Sec 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value.
5. I certify that the school(s) I represent will comply with all program rules, and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments.
6. I understand that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service receive an appropriate share of benefits from those services.
7. I recognize that I may be audited pursuant to this school's application. I will retain for five years any and all worksheets and other records that are used in preparation of our school's E-rate application, and, if audited, will make available to the Administrator such records.

KELLOGG & SOVEREIGN CONSULTING, LLC

Letter of Agency-E-rate Years 2002, 2003, 2004

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8. I certify that the school(s) I represent has (have) complied with the requirements of the Children's Internet Protection Act, as codified at 47 U.S. C. Sec. 254(h) and (l).
9. I understand that persons willfully making false statements on the E-rate forms or through this Letter of Agency can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. Secs. 502 and 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.
10. I certify that I am authorized to sign this letter of agency and to the best of my knowledge, information and belief, all information provided to Kellogg & Sovereign Consulting, LLC for the E-rate submission are true.

Signature of Authorized Person: Mark McPherson Date: 11-4-03

Printed Name of Authorized Person: Mark McPherson Title: Supt.

PLEASE SIGN IN BLUE INK AND RETURN TO:
Kellogg & Sovereign Consulting, LLC, 902 Arlington Center, PMB 136,
Ada, OK 74820

ATTACHMENT #

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